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GOOGLE LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANIBAL RODRIGUEZ, et al. individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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Case No. 3:20-CV-04688-RS

**DECLARATION OF HARRIS MATEEN IN
SUPPORT OF GOOGLE LLC'S MOTION IN
LIMINE NO. 14 TO EXCLUDE UNTIMELY
AND IRRELEVANT TESTIMONY REGARDING
RECENT DATA BREACHES**

Dept: 3, 17th Fl.
Judge: Hon. Richard Seeborg
Date Action Filed: July 14, 2020
Trial Date: August 18, 2025

1 I, Harris Mateen hereby declare as follows:

2 1. I am an associate with the law firm Cooley LLP and am counsel for Defendant
3 Google LLC in the above captioned action. I am licensed to practice law in the state of California
4 and am admitted to practice before this Court. I have personal knowledge of the matters stated
5 here, and if called as a witness, I could and would testify to them. I submit this declaration in
6 support of Defendant Google LLC's Motion in Limine No. 14 to exclude untimely and irrelevant
7 testimony about recent data breaches, filed concurrently.

8 2. On August 8, 2025, Plaintiffs' counsel emailed Google's counsel stating that
9 "Professors Schneier and Hochman intend to testify at trial about recent data breaches Google has
10 experienced[.]" and provided a hyperlink to an August 8, 2025 Forbes.com article titled *Google*
11 *Data Breach — August 8 Email Warnings Now Confirmed*.

12 3. A true and correct copy of the email from Plaintiffs counsel is attached hereto as
13 **Exhibit A**.

14 4. A true and correct copy of the hyperlinked Forbes.com article, downloaded on
15 August 10, 2025, is attached as **Exhibit B**.

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed on August 12, 2025, at San Francisco, California.

18
19 /s/ Harris Mateen
20 Harris Mateen